



BRAFMAN & ASSOCIATES, PC  
ATTORNEYS AT LAW  
767 THIRD AVENUE, 26TH FLOOR  
NEW YORK, NEW YORK 10017  
TELEPHONE: (212) 750-7800  
FACSIMILE: (212) 750-3906  
E-MAIL: ATTORNEYS@BRAFLAW.COM

PC  
USDS SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 12/11/19

BENJAMIN BRAFMAN

MARK M. BAKER  
OF COUNSEL

MARC A. AGNIFILO  
OF COUNSEL

ANDREA L. ZELLAN  
JOSHUA D. KIRSHNER  
JACOB KAPLAN  
TENY R. GERAGOS  
ADMITTED IN NY & CA  
STUART GOLD

December 10, 2019

VIA ECF

Honorable Kimba M. Wood  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

MEMO ENDORSED

Re: United States v. Goldstein, 18 CR 217 (KMW)

Dear Judge Wood:

As part of the bail conditions in the above-referenced case, Dr. Jeff Goldstein's travel was limited to the Southern and Eastern Districts of New York and the District of New Jersey (limited to counsel visits). We now write the Court requesting a modification of these travel restrictions to allow Dr. Goldstein to travel to and from the District of New Jersey on Thursday, December 12, 2019, and Monday, December 16, 2019, to allow Dr. Goldstein to drive his family to and from Newark Airport. Dr. Goldstein is also requesting permission to travel to the District of Maine from December 23<sup>rd</sup> – 29<sup>th</sup>, 2019, to spend the Christmas holiday with his family. Dr. Goldstein will provide his itinerary to Pretrial Services in advance of his trips.

We have spoken with the Government (AUSA Noah Solowiejczyk) and Pretrial Services (Officer Winter Pascual), and both have no objection to our request. Thank you for your consideration.

Respectfully submitted,  
s/  
Jacob Kaplan

cc: AUSA Noah Solowiejczyk (via ECF)

Pretrial Services Officer Winter Pascual (via email)

SO ORDERED: N.Y., Kimba M. Wood

KIMBA M. WOOD  
U.S.D.J.